

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

TQ DELTA, LLC,	§	
	§	
<i>Plaintiff,</i>	§	Civil Action No. 2:21-cv-309-JRG
v.	§	JURY TRIAL DEMANDED
NOKIA CORP., NOKIA SOLUTIONS AND NETWORKS OY, and NOKIA OF AMERICA CORP.	§	
	§	
<i>Defendants.</i>	§	
	§	

**TQ DELTA, LLC'S UNOPPOSED MOTION TO RESET THE DEADLINE FOR NOKIA
CORP. AND NOKIA SOLUTIONS AND NETWORKS OY TO RESPOND THE
ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT**

COMES NOW Plaintiff TQ Delta, LLC (“TQ Delta”) and hereby files this Unopposed Motion to Reset the Deadline for Nokia Corp. and Nokia Solutions and Networks Oy (“Foreign Nokia Defendants”) to Respond to the Original Complaint for Patent Infringement and shows as follows:

The Foreign Nokia Defendants have agreed to a deadline to answer or otherwise respond to the complaint on November 22, 2021. The current deadline for the Foreign Nokia Defendants to answer is December 6, 2021. This date is based on the only time entry allowed in CM/ECF for waivers of service, which did not allow TQ Delta to enter the earlier, agreed-to deadline of November 22, 2021. TQ Delta thus respectfully requests that the Court set the deadline to November 22, 2021.

Nokia Corp. and Nokia Solutions and Networks Oy are both organized and existing under the laws of Finland, with their principal place of business in Espoo, Finland. TQD Delta served its

waivers of the service of summons on Nokia Corp. and Nokia Solutions and Networks Oy on September 7, 2021, and the waivers were executed on September 23, 2021. Given that these entities are foreign corporations, the only deadline that CM/ECF allowed entry of for Nokia Corp and Nokia Solutions and Networks Oy was December 6, 2021 (Dkt Nos. 12 and 13). The parties have agreed to a November 22, 2021 deadline for Nokia Corp. and Nokia Solutions and Networks Oy to answer TQ Delta's Original Complaint for Patent Infringement. TQ Delta thus respectfully requests that the Court set the deadline for Nokia Corp. and Nokia Solutions and Networks Oy to November 22, 2021. This Motion does not seek to alter the deadline for Nokia of America Corp., which is set at October 7, 2021.

Dated: October 5, 2021

Respectfully submitted,

By: /s/ Christian Hurt
William E. Davis, III
Texas State Bar No. 24047416
bdavis@davisfirm.com

Christian J. Hurt
Texas State Bar No. 24059987
churt@davisfirm.com

Rudolph "Rudy" Fink IV
Texas State Bar No. 24082997
rfink@davisfirm.com

The Davis Firm PC
213 N. Fredonia Street, Suite 230
Longview, Texas 75601
Telephone: (903) 230-9090
Facsimile: (903) 230-9661

ATTORNEYS FOR PLAINTIFF
TQ DELTA, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document is being filed electronically in compliance with Local Rule CV-5(a). As such, this document is being served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(V). Pursuant to Federal Rule of Civil Procedure 5(d) and Local Rule CV-5(d) and (e), any counsel of record not deemed to have consented to electronic service will be served with a true and correct copy of the foregoing by email on this 5th day of October, 2021.

/s/ Christian Hurt
Christian Hurt

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel have complied with the meet-and-confer requirements of Local Rule CV-7(h) and (i) and that Defendants Nokia Corp. and Nokia Solutions and Networks Oy have agreed to a November 22, 2021 deadline to respond to the Complaint.

/s/ Christian Hurt
Christian Hurt